

KIRTON LAW FIRM

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MEMO ENDORSED

1/18/22

January 3, 2022

VIA ELECTRONIC FILING

Hon. Colleen McMahon
U.S. District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Surrender date Adjourned
to April 4, 2022.

Colleen McMahon

Re: *U.S. v. Jabron Green*, 19 cr. 496 (CM)

Dear Judge McMahon:

I represent Jabron Green in the above-referenced matter. Mr. Green pleaded guilty to a narcotics sale. This Court sentenced him to 60 months on September 22, 2022. Mr. Green is scheduled to surrender on Monday, January 24, 2022. The Defense requests a sixty-day extension of his surrender date.

Mr. Green and his wife are currently employed. Mr. Green has a child in college. He and his wife are responsible for paying his college-related expenses. Mr. Green will not be able to support his family financially while incarcerated. Mr. Green's wife will be responsible for all of the household expenses and the expenses related to their son. Mr. Green needs additional time to save enough income to provide for his family's future financial needs.¹

Mr. Green is also concerned about the spread of the Omicron variant of the COVID-19 virus. The Centers for Disease Control (CDC) has identified that the omicron variant is spreading exponentially in multiple countries.² CDC findings indicate increases in infections are most likely due to a combination of increased transmissibility and the ability to evade immunity conferred by past infection or vaccination.³ Mr. Green is at significant risk of infection from

¹ Last month, Mr. Green's wife was the victim of identity theft, she suffered a loss of approximately \$5000.00.

² www.cdc.gov/coronavirus/2019-ncov/science/forecasting/mathematical-modeling-outbreak.html

³ *Id.*

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COVID-19 if he is incarcerated. Mr. Green requests an opportunity for the level of Omicron-related infections to decrease in the Spring of 2022. The Government does not object to this application.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton

Marlon G. Kirton, Esq.

cc: Timothy Capozzi, Assistant United States Attorney (via electronic mail)
Maurene Comey, Assistant United States Attorney (via electronic mail)
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